

WHITE PAPER | How to ensure compliance with EU Food Labelling Regulation



From 13 December 2014, all companies that manufacture, sell or import food into the EU market need to comply with a new EU food labelling regulation. This paper will bring you up to speed on the key facts you need to know about this regulation and offer advice on how to ensure compliance in time to meet the deadline.

The new requirements in brief

1169/2011 introduces a new requirement to emphasise the presence of allergenic foods in the ingredients. Existing requirements for pre-packed foods are retained but 1169/2011 also requires manufacturers to provide allergy information for unpackaged foods. Individual EU member states will set out national measures on how this should be done.

The Food Standards Agency has published the following statement: "Labelling rules in European Directives 2003/89/EC and 2006/142/EC ensure that all consumers are given comprehensive ingredient listing information and make it easier for people with food allergies to identify ingredients they need to avoid. However, following implementation of the Food Information for Consumers Regulation (EU) No. 1169/2011, allergen labelling rules will be changing in December 2014. The new regulation, which was published in October 2011, will build on current allergen labelling provisions for pre-packed foods and will introduce a new requirement for allergen information to be provided for foods sold non-packed or pre-packed for direct sale. The three-year transition period allows businesses to make the necessary changes to their processes and labelling designs in order to meet the provisions laid out in the legislation."

Why the regulation is changing

Since there is no cure for food allergy, the only treatment available to consumers concerned is life-long avoidance of the foods that cause allergic reaction. Accurate food allergen information is therefore vital to help allergic consumers manage their condition. The new requirement to emphasise the presence of allergenic foods in the ingredients will make it easier for the allergic consumer to find and understand the allergen information provided.

How does the new regulation differ from the existing one?

Currently, the rules for pre-packed foods establish a list of 14 food allergens, which have to be indicated by reference to the source allergen whenever they, or ingredients made from them, are used at any level in pre-packed foods, including alcoholic drinks. The list consists of cereals containing gluten, crustaceans, molluscs, eggs, fish, peanuts, nuts, soybeans, milk, celery, mustard, sesame, lupin and sulphur dioxide at levels above 10mg/kg, or 10 mg/litre (expressed as SO₂).

While the existing requirement is for these allergens to be referred to on-pack, the common practice of printing statements such as 'May contain nuts' has been judged inadequate. As the British Retail Consortium explains in the document BRC Guidance on Allergen Labelling and the Requirements in Regulation 1169/2011, "Consumer research has suggested that consumers, who have been relying on these allergy boxes or statements to obtain allergen information, are likely to overlook the information provided in the ingredients list." The new regulation therefore specifically requires allergens to be highlighted within ingredients lists.

What the regulation means for the food and beverage industry

The regulation will impact on food and beverage manufacturers of all sizes, from caterers to packaging companies. Not only will it be mandatory for allergy information to be clearly highlighted directly on the ingredients lists of pre-packed retailed foods, it will also be necessary to provide foods offered/sold to the final consumer or to mass caterers without pre-packaging with information about allergenic ingredients. The regulation applies to all products sold in the EU, which means that every company selling in the EU market must comply, even if the company itself is based outside of the EU.

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How do I ensure compliance?

Food suppliers are required to clearly highlight allergens in the ingredients list by following specific rules on layout and design. For example, Article 12 (clarity and legibility) of 1169/2011 states, “To ensure clear legibility, use characters with a font size where the x-height is at least 1.2mm,” while Article 21 (labelling of allergens) stipulates that an allergenic ingredient is, “emphasised through a typeset that clearly distinguishes it from the rest of the ingredients by means of the font, style or background colour.”

NiceLabel

To help food suppliers get up-to-speed quickly and achieve compliance with the new regulation, NiceLabel has developed a simple, smart labelling solution. These smart labels enable users to automatically highlight allergens without modifying their existing databases. NiceLabel dynamically formats the allergen text before printing and is compatible with any Citizen label printer.

The NiceLabel food allergens solution produces labels that automatically and clearly emphasize the 14 allergenic substances listed within the EU regulations and also offers the flexibility for related words to be highlighted as desired. Once implemented, the database of allergens and related descriptors is easily maintained. NiceLabel is unique in that it allows users with no programming knowledge to create their own printing solutions, enabling food and beverage providers to achieve compliance with minimum effort.

Citizen Label Printers

Highlighting allergens in the ingredients list in a clear manner means that the quality of the print is critical. This will be effected by font sizes, styles and printing on coloured backgrounds. To achieve this on labels a high quality and reliable thermal printer is necessary. Citizen label printers produce high resolution and fast output labelling to help you meet the new regulation. For cost-effective, low to medium volume printing the CL-S521 and CL-S621 combine performance with reliability to deliver hundreds of labels every day. For medium to high volume, the CL-S700 provides ultra-fast print out of up to 250mm per second. And to provide the higher resolution required to print smaller labels Citizen's CL-S631 and CL-S703 printers are available as 300 dpi options.

My compliance plan

The following checklist will help you to consider the key issues and provide a road map towards swift compliance.

- Conduct an audit of all items that require updated labels
- Consult a nutritionist or allergy expert if required
- Collate all necessary product information for each item and carry out design work
- Implement a software solution
- Review and upgrade printers if required.

The necessary changes in practice will be easier to implement if you act now. By following the advice in this paper you take immediate action to protect sales and make a smooth transition towards compliance.

Sources:

The Food Standards Agency – Food Allergen Labelling

www.food.gov.uk/science/allergy-intolerance/label/#.U8Tut5RdWAg

BRC Guidance on Allergen Labelling and the Requirements in Regulation 1169/2011

www.brc.org.uk/downloads/Guidance%20on%20Allergen%20Labelling.pdf

To learn more about EU Food Regulation solution or to download the NiceLabel free trial, please visit www.nicelabel.com/allergens.

To view label printing solutions from Citizen Systems Europe, go to www.citizen-europe.com/en/printer/label/overview